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ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**ALI SALEEM BEY and JOHN
MUHAMMAD BEY,**

Plaintiffs,

vs.

CITY OF OAKLAND, et al.,

Defendants

Case No: 14-cv-01626-JSC

**DECLARATION OF A. CABRAL
BONNER IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Hearing Date: JULY 29, 2019

Time: 10:00 a.m.

Courtroom: F

**Place: 15th Floor
450 Golden Gate Ave.
San Francisco, CA**

Judge: The Hon. Jacqueline S. Corley

I, A. CABRAL BONNER, declare as follows:

1. I am an attorney duly licensed by the State of California duly to practice law before all courts in the State of California including the United States District Court for the Northern District of California.

2. My business address is 475 GATE FIVE ROAD, SUITE 212, SAUSALITO, CA 94965

3. I have personal knowledge of the matters set forth herein, except those stated on information and belief. If called as a witness I could competently testify thereto.

4. PLAINTIFFS have brought this action to address Oakland Police Department

DECLARATION OF A. CABRAL BONNER IN SUPPORT OF PLAINTIFF'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL

14-cv-01626-JSC

1 (“OPD”) accountability, and to evaluate and mandate compliance with the Negotiated
2 Settlement Agreement. (“NSA”).

3 5. The following documents from the Declaration of A. Cabral Bonner in opposition
4 to Defendants’ Motion for Summary Adjudication contain confidential information and
5 should be filed under seal in their entirety:

- 6 a. Exhibit 2: Deposition of Ersie Joyner
- 7 b. Exhibit 4: Deposition of Paul Figueroa
- 8 c. Exhibit 5. Deposition of Patrick Caceres
- 9 d. Exhibit 6: Excerpts of DOJ Longmire Interview
- 10 e. Exhibit 7: 04-019500 LRMS Waajid Bey
- 11 f. Exhibit 8: 05-034462 Case Notes
- 12 g. Exhibit 9: 05-034462 John Bey Incident Report
- 13 h. Exhibit 10: 05-034462 Police Reports
- 14 i. Exhibit 11: 07-0538 Log
- 15 j. Exhibit 13: 07-0538 CPRB Complaint
- 16 k. Exhibit 14: 7/12/07 Dellums Letter to DA
- 17 l. Exhibit 15: 07-059842 CPRB Follow-up Report
- 18 m. Exhibit 16: 07-0553 Log
- 19 n. Exhibit 17: 07-0553 DOJ Report
- 20 o. Exhibit 19: 13-1062 10/4/13 Email from Lois to Griffin
- 21 p. Exhibit 20: 13-1062 11/6/13 CRPB Continued Complaint
- 22 q. Exhibit 21: 13-1062 Log
- 23 r. Exhibit 22: 13-1062 Email Notice to Downing Regarding Sustained Allegation
- 24 s. Exhibit 23: 13-1062 4/15/14 Email Cunningham to Supriano
- 25 t. Exhibit 24: 13-1062 ASB Closing Out
- 26 u. Exhibit 25: 13-1062 JMB Closing Out
- 27 v. Exhibit 26: 13-1062 Report
- 28 w. Exhibit 28: 13-1062 Att 1-13 Joyner Transcript

- x. Exhibit 29: Outlaw Email Letter 8/15/13
- y. Exhibit 30: 13-1062 Letters and Emails to OPD
- z. Exhibit 32: 13-1062 CPRB Notice and Complaint
- aa. Exhibit 38: Deposition of William Griffin
- bb. Exhibit 39: CID Call Schedule
- cc. Exhibit 40: 7/25/07 IAD Note
- dd. Exhibit 45: Letter Dated February 21, 2013
- ee. Exhibit 46: Letter Dated November 30, 2012
- ff. Exhibit 47: Letter Dated November 5, 2012
- gg. Exhibit 48: Letter Dated February 8, 2013
- hh. Exhibit 49: Complaint Investigation Report
- ii. Exhibit 50: Letter Dated January 7, 2013
- jj. Exhibit 53: Photos of John Bey and Crime Scene
- kk. Exhibit 54: 05-0538 Complaint Investigation Report
- ll. Exhibit 55: 10/4/11 Email from Robyn Clark to Robert Messier
- mm. Exhibit 58: 13-1062 CPRB Case Assignment Form
- nn. Exhibit 59: Bey's Complaints

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on this 9th day of July, 2019 in Sausalito, California.

By: /s/ A. CABRAL BONNER
A. CABRAL BONNER
Attorney for Plaintiff